

EXHIBIT

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Colby Beuck

May 14, 2012

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

STATE OF TEXAS,)

Plaintiff,)

VS.)

ERIC H. HOLDER, JR. in his)
official capacity as Attorney)
General of the United States,)

Defendant,)

ERIC KENNIE, et al,)

Defendant-Intervenors,)

TEXAS STATE CONFERENCE OF)
NAACP BRANCHES,)

Defendant-Intervenors,)

TEXAS LEAGUE OF YOUNG VOTERS)
EDUCATION FUND, et al,)

Defendant-Intervenors,)

TEXAS LEGISLATIVE BALCK)
CAUCUS, et al,)

Defendant-Intervenors,)

VICTORIA RODRIGUEZ, et al.,)

Defendant-Intervenors.)

CASE NO. 1:12-CV-00128
(RMC-DST-RLW)
Three-Judge Court

ORAL DEPOSITION OF

COLBY BEUCK

MAY 14, 2012



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Austin, TX 78746
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Colby Beuck

May 14, 2012

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1 ORAL DEPOSITION OF COLBY BEUCK, produced as a
2 witness at the instance of the Defendant, was duly
3 sworn, was taken in the above-styled and numbered cause
4 on the MAY 14, 2012, from 9:50 a.m. to 6:08 p.m., before
5 Chris Carpenter, CSR, in and for the State of Texas,
6 reported by machine shorthand, at the offices of The
7 United States Attorney, 816 Congress Avenue, Suite 1000,
8 Austin, Texas 78701, pursuant to the Federal Rules of
9 Civil Procedure and the provisions stated on the record
10 or attached hereto.
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1 A. Yes.

2 Q. Do you e-mail her on a work e-mail, or her
3 personal e-mail, or all the above?

4 A. All of the above.

5 Q. What do you generally -- what e-mail do you
6 generally use with Representative Harless?

7 A. It depends. Typically, it is her -- her -- a
8 personal account.

9 Q. Under Texas FOIA, public information law, are
10 citizens able to obtain e-mails through the government
11 account?

12 A. I'm not an expert --

13 Q. To the extent you know.

14 A. -- on the public information law, so I can't --
15 I know state e-mails are subject to the open records
16 law.

17 Q. Do you know whether legislators sometimes use
18 personal e-mail to avoid FOIA?

19 MR. SWEETEN: Objection, calls for
20 speculation.

21 Q. (By Ms. Westfall) You may answer.

22 A. I can't speak to that. I don't know. I can't
23 speak for other legislators.

24 Q. Do you know whether Representative Harless has
25 a Gmail account?



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